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Attorneys for Intervenor Bank of America, N.A.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

AWS, LLC, a Nevada limited liability company; ADAMS CONSULTING, LLC, a California limited liability company; FBA DISTRIBUTORS, LLC, a Massachusetts limited liability company FBA STORES, LLC, a Nevada limited liability company; GLOBAL MARKETING SERVICES L.L.C., a Nevada limited liability company; INFO PROS, LLC, a Nevada limited liability company; INFO SOLUTIONS, LLC, a Nevada limited liability company; ONLINE AUCTION LEARNING CENTER, INC., a Massachusetts corporation; ONLINE AUCTION LEARNING CENTER, INC., a Nevada corporation; CHRISTOPHER F. BOWSER, individually and as an officer of FBA DISTRIBUTORS, LLC, FBA STORES, LLC, INFO SOLUTIONS, LLC, ONLINE AUCTION LEARNING CENTER, INC. and ONLINE AUCTION LEARNING CENTER, INC.; ADAM S. BOWSER, individually and

CASE NO.: 2:18-cv-00442-JCM-PAL

**STIPULATION AND ORDER
ALLOWING BANK OF AMERICA, N.A.
TO INTERVENE AND FILE
COMPLAINT-IN-INTERVENTION**

HOLLAND & HART LLP
9555 HILLWOOD DRIVE, 2ND FLOOR
LAS VEGAS, NV 89134

as an officer of AWS, LLC, FBA DISTRIBUTORS, LLC, FBA STORES, LLC, INFO SOLUTIONS, LLC, ONLINE AUCTION LEARNING CENTER, INC. and ONLINE AUCTION LEARNING CENTER, INC.; JODY L. MARSHALL, individually and as an officer of INFO PROS, LLC and INFO SOLUTIONS, LLC; and JEFFERY A. GOMEZ, a/k/a JEFF ADAMS or JEFF ADAM, individually and as an officer of ADAMS CONSULTING, LLC and GLOBAL MARKETING SERVICES L.L.C.,

Defendants.

Proposed Intervenor, Bank of America, N.A. (the “Bank”), and Plaintiff, Federal Trade Commission (“FTC”), by and through their respective counsel of record, hereby stipulate and agree as follows:

1. On September 19, 2018, the Bank filed a Motion to Intervene (ECF No. 91) (the “Motion”) in this action.

2. The Bank shall be granted leave to intervene in this matter as a matter of right under FRCP 24 and to file its proposed Complaint-In-Intervention (the “Complaint”), as set forth in Exhibit 1 to the Motion.

3. The FTC reserves its right to assert all defenses, objections and counterclaims it may have in response to the Bank’s Complaint, including the FTC’s claim against the proceeds and accounts that are the subject of the Complaint.

4. The Bank and the FTC stipulate and agree to waive service of process of the summons and Complaint in accordance with FRCP 4(d). Accordingly, the FTC shall have 60 days from the date the Court approves this Stipulation authorizing the filing of the Complaint to

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1 answer or otherwise plead, including making a motion under FRCP 12, in response to the
2 Complaint.

3 IT IS SO STIPULATED:

4 DATED September 26, 2018

5 /s/ Robert J. Cassity
6 Lars K. Evensen, Esq. (NV Bar No. 8061)
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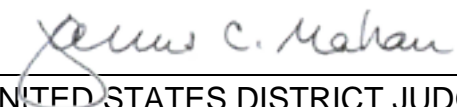
16 *Attorneys for Intervening Party, Bank of*
17 *America, N.A.*

DATED September 26, 2018

/s/ Roberto Anguizola
Roberto Anguizola, Esq.
Gregory J. Evans, Esq.
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Attorney for Plaintiff
Federal Trade Commission

16 IT IS SO ORDERED:

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18 UNITED STATES DISTRICT JUDGE
19 DATED: September 27, 2018